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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 ABDULZAHIR TURKMANI, ) Case No. 2:10-cv-00711-KJD-RJJ  
16 Plaintiff, )  
17 v. )  
18 MICHAEL J. ASTRUE, )  
19 Commissioner of Social )  
20 Security, )  
21 Defendant. )  
22 \_\_\_\_\_)

23 **UNOPPOSED DEFENDANTS' MOTION FOR EXTENSION OF TIME**

24 (First Request)

25 COMES NOW defendants, by and through their attorneys, Daniel  
26 G. Bogden, United States Attorney for the District of Nevada, and  
27 Carlos A. Gonzalez, Assistant United States Attorney, and request  
28 a sixty (60) day extension of time, to file an appropriate and  
29 meaningful response to Plaintiff's Request for Remand.

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1 Defendants' current deadline to answer plaintiffs complaint  
2 is April 21, 2011. Undersigned counsel must coordinate  
3 defendants appropriate response to the complaint with the Social  
4 Security Office of Regional Chief Counsel in San Francisco,  
5 California. At the present time that office is preparing  
6 numerous answers and pleadings to be filed on litigation  
7 presently pending with various District Courts in the western  
8 region of the United States as well as the 9<sup>th</sup> Circuit Court of  
9 Appeals. On April 4, 2011, undersigned counsel contacted Mr.  
10 Marc V. Kalagian, counsel for plaintiff to inform him of the need  
11 for the instant motion for an extension of time. He indicated  
12 that he does not have any objections.

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It is therefore respectfully requested that defendants be granted a sixty (60) day extension of time to file an appropriate pleading to answer complaint up to and including June 20, 2011.

DATED this 6th day of April 2011.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/ Carlos A. Gonzalez  
CARLOS A. GONZALEZ  
Assistant United States Attorney

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATE: April 11, 2011